

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Douglas Charles WILSON

Case: 2:23-mj-30430

Assigned To : Unassigned

Assign. Date : 10/24/2023

Case No.

Description: RE: DOUGLAS
CHARLES WILSON (EOB)

CRIMINAL COMPLAINT

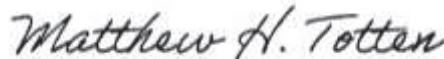
I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 14, 2023 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C. 922(g)(1)

Felon in possession of a firearm

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.Sworn to before me and signed in my presence
and/or by reliable electronic means.Date: October 24, 2023City and state: Detroit, Michigan*Complainant's signature*Special Agent Matthew Totten - ATF*Printed name and title**Judge's signature*Honorable David R. Grand, U.S. Magistrate Judge*Printed name and title*

**AFFIDAVIT IN SUPPORT OF
CRIMINAL COMPLAINT**

I, Matthew Totten, being duly sworn, hereby depose and state as follows:

I. INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent (SA) with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), and have been since March of 2020. Prior to the ATF, I was a Michigan State Police Trooper for approximately six years. I have been involved in numerous investigations into the unlawful use and possession of firearms, to include felon in possession of a firearm.

2. I make this affidavit from personal knowledge based on my participation in this investigation. The information comes from witnesses interviewed by law enforcement, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience.

3. This affidavit is for the limited purpose of establishing probable cause that Douglas WILSON (DOB: xx/xx/1983) has violated 18 U.S.C. § 922(g)(1), being a felon in possession of a firearm, and does not contain all details or facts known to law enforcement related to this investigation.

II. PROBABLE CAUSE

4. I reviewed a computerized criminal history and Michigan Department of Corrections records for WILSON, which revealed the following felony convictions punishable by imprisonment for a term exceeding one year, among others:

a. 2009: Felony Weapons – Carrying Concealed, Pled Guilty

5. On October 14, 2023, at approximately 11:35 p.m., Detroit Police officers in fully marked uniforms and patrol were patrolling in the area of Cheyenne and Midland which is a known area for frequent breaking and entering/theft of vehicles.

6. Officers observed two people in the vehicle that were later identified as M.iA. and Douglas WILSON. Officers illuminated the vehicle and observed WILSON drop his right arm down. They also observed smoke coming from the vehicle and smelled a strong odor of burning marijuana.

7. An officer approached WILSON and made contact with him in the front passenger seat. The officer observed burning marijuana in WILSON's hand and it appeared to the officer that WILSON straightened his legs out to try and conceal something under his legs. At that time, the officer observed a firearm on the floor under WILSON's legs. WILSON was removed from the vehicle and detained, and the firearm was recovered.

8. Officers recovered a loaded, black Spikes Tactical AR15 Pistol with Serial number: HB00623.

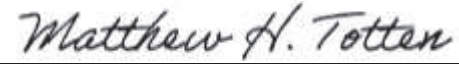
9. A law enforcement database was utilized to inquiry on the firearm. The Law Enforcement Intelligence Network (LEIN) results showed that the firearm was stolen on May 20, 2018, out of Lincoln Park, MI.

10. On October 23, 2023, I contacted ATF Interstate Nexus Expert, Special Agent Pharr and provided a verbal description of the Spikes Tactical AR15 Pistol recovered by Detroit Police officers on October 23, 2023. SA Pharr said that the firearm was manufactured outside of the state of Michigan, and therefore has traveled in and affected interstate commerce.

III. CONCLUSION

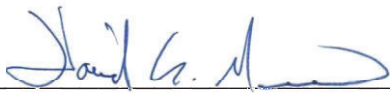
2. Based upon the aforementioned facts stated herein, there is probable cause to believe Douglas WILSON (DOB: xx/xx/1983), a convicted felon aware of his felony convictions, did knowingly and intentionally possess a black Spikes Tactical AR15 Pistol with Serial number: HB00623, said firearm having affected interstate commerce, in violation of 18 U.S.C. 922(g)(1) (being a felon in possession of a firearm). Said violation occurring on or about October 14, 2023 in Detroit, Michigan, in the Eastern Judicial District of Michigan.

Respectfully submitted,



Matthew Totten, Special Agent
Bureau of Alcohol, Tobacco, Firearms
and Explosives

Sworn to before me and signed in my presence
and/or by reliable electronic means.



Hon. David R. Grand
United States Magistrate Judge

Dated: October 24, 2023